

SHAWN A. MANGANO, ESQ. (Nevada Bar No. 6730)
shawnmangano@bayramoglu-legal.com
NIHAT DENIZ BAYRAMOGLU, ESQ. (Nevada Bar No. 14030)
deniz@bayramoglu-legal.com
DAVID SILVER (Nevada Bar No. 15641)
david@bayramoglu-legal.com
BAYRAMOGLU LAW OFFICES LLC
1540 West Warm Springs Road Suite 100
Henderson Nevada 89014
Telephone: 702.462.5973
Facsimile: 702.553.3404

Attorneys for Plaintiff Jiangxi Panda Fireworks Co., Ltd.

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

JIANGXI PANDA FIREWORKS CO., LTD.,
a Chinese entity,

Plaintiff,

vs.

DOUGLAS BURDA, AN individual; KONCEPT
LLC, a Nevada limited liability company doing
business as BURDA IP; ELISSA BURDA, an
individual; RED APPLE FIREWORKS CO.,
LTD., a Nevada limited liability company; 1.4G
HOLDINGS, LLC, a Nevada limited liability
company,

Defendants.

Case No.: 2:23-cv-01232-MMD-DJA

**STIPULATION AND ORDER TO
CONTINUE STAY DEADLINES**

**Chief Judge Miranda M. Du
Magistrate Judge Daniel J. Albregts**

Plaintiff Jiangxi Panda Fireworks Co., Ltd. (“Plaintiff”), by and through its counsel Bayramoglu Law Offices LLC, and Defendants Red Apple Fireworks Co., Ltd., and 1.4g Holdings, LLC, (“Defendants” and collectively referred to with Plaintiff as the “Parties”), by and through their counsel Gibson Lexbury LLP, hereby submit this Stipulation and Order to Stay Deadlines for Thirty-Days, previously extended by the Court on August 5, 2024 [Dkt. No. 78] and set to expire on November 3, 2024.

1 **IT IS HEREBY STIPULATED AND AGREED** between the Parties as to the following:

2 1. On March 20, 2024, the Parties submitted a Stipulation for Stay of Discovery and
3 Discovery Related Motions Pending Adjudication of Defendants’ Motion to Compel Arbitration
4 (the “First Request”) [Dkt. No. 63].

5 2. On March 22, 2024, this Court Granted the Parties’ First Request [Dkt. No. 64].

6 3. On May 17, 2024, this Court Granted Defendants’ Motion to Compel Arbitration
7 on Plaintiff’s Seventeenth through Twenty-Second Claims [Dkt. No. 69].

8 4. On June 24, 2024, the Parties filed a Stipulation regarding Discovery Deadlines
9 [Dkt. No. 75], pursuant to this Court’s June 10, 2024 Minute Order [Dkt. No. 72].

10 5. On June 25, 2024, this Court Granted the Parties’ Stipulation to Extend Discovery
11 Deadlines [Dkt. No. 76].

12 6. On August 2, 2024, the Parties filed a Stipulation to Stay Discovery Deadlines
13 Pending Mediation [Dkt. No. 77].

14 7. On August 5, 2024 this Court Granted the Parties’ Stipulation to Stay Discovery
15 Deadlines Pending Mediation [Dkt. No. 78] and set to expire on November 3, 2024.

16 8. The Parties attended a remote mediation on ~~on~~ October 16, 2024 and are in active
17 negotiation in an attempt to settle this dispute.

18 9. Based on the foregoing, the Parties ask the Court to stay all discovery deadlines in
19 this matter for a period of thirty (30) days so that they can continue their settlement discussions.

20 **WHEREFORE,**

21 1. The Parties are actively engaging and working in good faith to resolve this matter
22 and settlement terms are being discussed.

23 2. The Parties agree the settlement would cover the claims in this instant action, and
24 the claims currently stayed in the related Eastern District of Arkansas Case No. 4:23-cv-00346-
25 BRW.

3. The Parties agree that a thirty-day (30) stay of discovery is in the best interest of judicial efficacy and will save the Court and Parties' considerable time and resources.

4. Accordingly, the Parties agree to file a Joint Status Report by the expiration of the thirty-day stay, on or before December 3, 2024 informing this Court if the matter has resolved or shall proceed with a proposed discovery schedule.

5. This stipulation is made in good faith and not for the purposes of delay.

Respectfully submitted this 21st day of October, 2024.

BAYRAMOGLU LAW OFFICES LLC

By: /s/ David Silver
DAVID SILVER, ESQ.
(Nevada Bar No. 15641)
david@bayramoglu-legal.com
1540 West Warm Springs Road Suite 100
Henderson Nevada 89014
Telephone: 702.462.5973
Facsimile: 702.553.3404

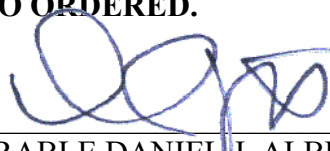
*Attorneys for Plaintiff Jiangxi Panda
Fireworks Co., Ltd.*

GIBSON LEXBURY LLP

By: /s/ Steven A. Gibson
STEVEN A. GIBSON, ESQ.
Nevada Bar No. 6656
sgibson@gibsonlexbury.com
10501 West Gowan Road, Suite 260
Las Vegas, Nevada 89129
(702) 541-8200 Telephone
(702) 541-7899 Facsimile

Attorneys for Defendants

IT IS SO ORDERED.



HONORABLE DANIEL J. ALBREGTS
UNITED STATES MAGISTRATE JUDGE

DATE: 10/28/2024

CERTIFICATE OF SERVICE

I, hereby certify that on October 21, 2024, I electronically filed the foregoing with the Court using the CM/ECF system, and thereby delivered the foregoing by electronic means to all counsel of record.

By: /s/
DAVID SILVER
Bayramoglu Law Offices LLC